



## Mars Khaimov Law, PLLC

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**Via ECF**

Honorable Edgardo Ramos  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

December 22, 2022

**Re: Jovan Campbell v. Fischer & Wieser Specialty Foods, Inc., 22-9791-ER**

Dear Judge Ramos:

Plaintiff's Counsel submits this letter-motion on behalf of the Defendant, who is seeking an extension of time to respond to the Complaint. Counsel has been in touch with Defendant's attorney in Austin, Texas, who is not admitted in the District. As such, Defendant is requesting an additional 30 days to respond for the Parties to discuss an early resolution, and to possibly hire local counsel. The current deadline is December 27, 2022, and Defendant is seeking an extension to respond up to and until January 27, 2023. This is the first time this relief is being sought and both Parties consent.

Plaintiff thanks the Court for its attention herein.

**Respectfully and sincerely,**

**/s/ Mars Khaimov, Esq.**

